

## REMARKS

This paper is submitted in response to the Office action mailed on June 24, 2008. This paper amends claims 1, 18, and 20. Accordingly, after entry of this Amendment and Response, claims 1-7, 11-26, and 30-32 will be pending.

### *I. Claim Rejections Under 35 U.S.C. § 112*

The Office Action rejects claims 1-7, 11-13, 18, and 20 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Particularly, with respect to claim 1, the Office Action states claim 1 is a system claim that finishes with what appears as a method step (Office Action dated June 24, 2008; page 2). Claim 1 has been amended to clarify that the query processing section routes the query. Thus, the Applicant respectfully submits that claims 1-7 and 11-13 are distinct.

With respect to claim 18, the Office Action states there is no antecedent basis for a website (Office Action dated June 24, 2008; page 2). Claim 18 has been amended and the Applicant respectfully submits that claim 18 is distinct.

With respect to claim 20, the Office Action states there is no antecedent basis for the keyword database (Office Action dated June 24, 2008; page 2). Claim 20 has been amended and the Applicant respectfully submits that claim 20 is distinct.

### *II. Claim Rejections Under 35 U.S.C. § 102*

The Office Action rejects claims 1-7, 11-26, and 30-32 under 35 U.S.C. § 102(b) as being anticipated by Robinson (U.S. Publication No. 2001/0054001) (hereinafter "Robinson"). The Applicant respectfully traverses the rejection. In order for a reference to anticipate a claim under 35 U.S.C. § 102(b), the reference must teach each and every element of the claim in a single reference. For at least the following reasons, the Applicant respectfully submits that Robinson does not anticipate any of the claims.

Claims 1, 14, and 19 are independent claims with all other pending claims depending therefrom. First, among other limitations, claim 1 recites retrieving, "**responsive to an advertising unit selection** entered on a query client computer, a next advertiser in a rotation of participating advertisers associated with said advertising unit, based on the bid denominations of the participating advertisers; and [routing] the query client to an advertising content page associated with the next advertiser in the rotation of participating advertisers retrieved by the query processing section." Emphasis added.

Robinson discloses selecting an advertisement at a client for display to a user based on advertising targeting information stored at the client (abstract). The Office Action states

that ads associated with bids from advertisers are displayed upon successful selection by an arbitration module (Office Action dated June 24, 2008; page 3). The display of the ad is taken to meet the feature of routing the client to the advertising web page content of the chosen advertiser (Office Action dated June 24, 2008; page 3). However, the fact that the arbitration module in Robinson selects an advertisement to display does not mean that Robinson discloses retrieving a next advertiser in response to **selection of an advertising unit** entered on a client computer and routing the query client to an advertising content page associated with the next advertiser. Robinson is concerned with which ad to show at a given time, not when to show an ad. Robinson states “software is running in the machine of the consumer in which the choice is made regarding which ad to show the consumer at a given time” (paragraph 0007). Robinson does not state anywhere that the display of an ad, regardless which ad is chosen, is performed in response to the selection of an advertising unit. Robinson is silent as to the triggering of displaying an ad, merely addressing which ad to display when an ad is displayed. Thus, Robinson does not disclose retrieving, responsive to an advertising unit selection entered on a query client computer, a next advertiser in a rotation of participating advertisers associated with said advertising unit, based on the bid denominations of the participating advertisers; and routing the query client to an advertising content page associated with the next advertiser in the rotation of participating advertisers retrieved by the query processing section.

Similarly, claim 14 recites “[retrieving], responsive to a request for an advertising unit for display on a query client computer, a next advertiser and advertising content associated with the next advertiser in a rotation of participating advertisers associated with said advertising unit, based at least in part on the bid denominations of the participating advertisers.” For at least the reasoning set forth above with respect to claim 1, the Applicant respectfully submits that Robinson does not disclose such features.

Similarly, claim 19 recites “retrieving, responsive to said advertising unit selection, a next advertiser in a rotation of participating advertisers associated with said advertising unit, based on the bid denominations of the participating advertisers; and routing the query client to an advertising content page associated with the next advertiser in the rotation of participating advertisers retrieved by the query processing section.” For at least the reasoning set forth above with respect to claim 1, the Applicant respectfully submits that Robinson does not disclose such features.

Further, claim 1 recites an “account database comprising a plurality of advertising accounts having funds associated therewith.” The Applicant respectfully submits that Robinson does not disclose such features.

The Office Action states that in Robinson, an arbitration module provides ad selection from a plurality of advertisers and ads (which include bids) and this is taken as providing a

database representing advertisers and their bids (Office Action dated June 24, 2008; page 3). However, the Office Action does not cite to any portion of Robinson as disclosing an account database comprising a plurality of advertising accounts having funds associated therewith. In fact, Robinson does not mention of advertising accounts having funds associated therewith. Robinson discloses ads selected for display based on bids (paragraph 0014), but does not disclose an account database comprising a plurality of advertising accounts having funds associated therewith. For at least these reasons, the Applicant respectfully submits that Robinson does not anticipate claim 1.

Similarly, claim 14 recites an “account database comprising a plurality of advertising accounts having funds associated therewith.” For at least the reasoning set forth above with respect to claim 1, the Applicant respectfully submits that Robinson does not disclose such features. Thus, the Applicant respectfully submits that Robinson does not anticipate claim 14.

Similarly, claim 19 recites an “account database comprising a plurality of advertising accounts having funds associated therewith.” For at least the reasoning set forth above with respect to claim 1, the Applicant respectfully submits that Robinson does not disclose such features. Thus, the Applicant respectfully submits that Robinson does not anticipate claim 19.

Claims 2-7, 11-13, 15-18, and 20-32 depend, respectively, from independent claims 1, 14, and 19. Thus, the Applicant respectfully submits that claims 2-7, 11-13, 15-18, and 20-32 are allowable due to their dependence on an allowable base claim.

### III. Conclusion

The Applicant thanks the Examiner for his thorough review of the application. The Applicant respectfully submits the present application, as amended, is in condition for allowance and respectfully requests the issuance of a Notice of Allowability as soon as practicable.

The Applicant believes no fees or petitions are due with this filing. However, should any such fees or petitions be required, please consider this a request therefor and authorization to charge Deposit Account No. 04-1415 as necessary.

If the Examiner should require any additional information or amendment, please contact the undersigned attorney.

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Respectfully submitted,

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